



UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

March 2025 Grand Jury

UNITED STATES OF AMERICA,
Plaintiff,
v.
SALVADOR ALEXIS ACOSTA-ROSALES,
aka "Salvador Alexi Acosta
Rosales," and
DAVID ARNULFO SAENZ-ROSALES,
Defendants.

ED CR No. 5:25-cr-00230-SSS

I N D I C T M E N T

[18 U.S.C. § 659: Possession of
Goods Stolen from Interstate
Shipment; 8 U.S.C. § 1326(a):
Alien Found in the United States
Following Deportation; 18 U.S.C.
§ 981(a)(1)(C) and 28 U.S.C.
§ 2461: Criminal Forfeiture]

The Grand Jury charges:

COUNT ONE

[18 U.S.C. §§ 659; 2(a)]

On or about June 25, 2025, in San Bernardino County, within the
Central District of California, defendants SALVADOR ALEXIS ACOSTA-
ROSALES, also known as "Salvador Alexi Acosta Rosales," and DAVID
ARNULFO SAENZ-ROSALES, aiding and abetting each other, knowingly had
in their possession goods and chattels of a value in excess of
\$1,000, that is, approximately 104 pairs of shoes valued at
approximately \$22,464, which had been embezzled and stolen from BNSF

1 train ZSBDWSP825A while moving in interstate commerce, knowing that
2 said goods and chattels had been embezzled and stolen.

3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1 COUNT TWO

2 [8 U.S.C. § 1326(a)]

3 On or about June 25, 2025, defendant SALVADOR ALEXIS ACOSTA-
4 ROSALES, also known as "Salvador Alexi Acosta Rosales," an alien, who
5 had been officially deported and removed from the United States on or
6 about June 7, 2023, and on or about November 5, 2024, was found in
7 San Bernardino County, within the Central District of California,
8 after knowingly and voluntarily re-entering and remaining in the
9 United States without having obtained permission from the Attorney
10 General or her designated successor, the Secretary of Homeland
11 Security, to reapply for admission to the United States following
12 deportation and removal.

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

1 COUNT THREE

2 [8 U.S.C. § 1326(a)]

3 On or about June 25, 2025, defendant DAVID ARNULFO SAENZ-
4 ROSALES, an alien, who had been officially deported and removed from
5 the United States on or about March 19, 2018, and on or about
6 November 6, 2024, was found in San Bernardino County, within the
7 Central District of California, after knowingly and voluntarily re-
8 entering and remaining in the United States without having obtained
9 permission from the Attorney General or her designated successor, the
10 Secretary of Homeland Security, to reapply for admission to the
11 United States following deportation and removal.

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

1 FORFEITURE ALLEGATION

2 [18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c)]

3 1. Pursuant to Rule 32.2 of the Federal Rules of Criminal
4 Procedure, notice is hereby given that the United States of America
5 will seek forfeiture as part of any sentence, pursuant to Title 18,
6 United States Code, Section 981(a)(1)(C) and Title 28, United States
7 Code, Section 2461(c), in the event of any defendant's conviction of
8 the offense set forth in Count One of this Indictment.

9 2. Any defendant, if so convicted, shall forfeit to the United
10 States of America the following:

11 (a) All right, title and interest in any and all property,
12 real or personal, constituting, or derived from, any proceeds
13 traceable to any such offense; and

14 (b) To the extent such property is not available for
15 forfeiture, a sum of money equal to the total value of the property
16 described in subparagraph (a).

17 3. Pursuant to Title 21, United States Code, Section 853(p),
18 as incorporated by Title 28, United States Code, Section 2461(c), any
19 defendant so convicted shall forfeit substitute property, up to the
20 total value of the property described in the preceding paragraph if,
21 as the result of any act or omission of the defendant, the property
22 described in the preceding paragraph, or any portion thereof: (a)
23 cannot be located upon the exercise of due diligence; (b) has been
24 transferred, sold to or deposited with a third party; (c) has been

25 ///

26 ///

27

28

1 placed beyond the jurisdiction of the court; (d) has been
2 substantially diminished in value; or (e) has been commingled with
3 other property that cannot be divided without difficulty.

4

5 A TRUE BILL

6

7 *[Signature]*
Foreperson

8

9 BILAL A. ESSAYLI
United States Attorney

10

Christina Shay

11

12 CHRISTINA T. SHAY
Assistant United States Attorney
13 Chief, Criminal Division

14

PETER DAHLQUIST
Assistant United States Attorney
15 Chief, Riverside Branch Office

16

ERIN C. KISS
Assistant United States Attorney
17 Riverside Branch Office

18

19

20

21

22

23

24

25

26

27

28